

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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Estate of VALERIE YOUNG, et al.,	:	
	:	<b>DECLARATION OF</b>
Plaintiffs,	:	<b>JOSE L. VELEZ IN</b>
	:	<b>SUPPORT OF</b>
- against -	:	<b>DEFENDANTS' MOTION</b>
	:	<b>FOR SUMMARY</b>
STATE OF NEW YORK OFFICE OF MENTAL	:	<b>JUDGMENT</b>
RETARDATION AND DEVELOPMENTAL	:	
DISABILITIES, et al.,	:	07-CV-6241 (LAK)(DCF)
	:	ECF Case
Defendants.	:	

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JOSE L. VELEZ, an attorney admitted to practice before the Courts of the State of New York and this Court, certifies pursuant to 28 U.S.C. § 1746 and under penalty of perjury, that the following is true and correct:

1. I am an Assistant Attorney General in the office of Andrew M. Cuomo, Attorney General of the State of New York, attorney for defendants State of New York Office of Mental Retardation and Developmental Disabilities (“OMRDD”), Brooklyn Developmental Disabilities Service Office (“BDDSO”) Director Peter Uschakow, Deputy Director of Operations Jan Williamson, Residential Unit Supervisor Gloria Hayes, Treatment Team Leader Kathleen Ferdinand and Medical Doctor Jovan Milos, and Hudson Valley Developmental Disabilities Services Office Deputy Director of Operations Suresh Arya.

2. Annexed hereto under Exhibit Tab A is a true and accurate copy of Plaintiffs’ Complaint filed with the Court on July 6, 2007.

3. Annexed hereto under Exhibit Tab B is a true and accurate copy of Defendants’ Answer to the Complaint filed with the Court on September 21, 2007.

4. Annexed hereto under Exhibit Tab C is a true and correct copy of the Joint Pretrial Order, dated July 2, 2008.

5. Annexed hereto under Exhibit Tab D is a true and accurate copy of designated pages of the transcript of the deposition of plaintiff Viola Young that was taken on January 29, 2008.

6. Annexed hereto under Exhibit Tab E is a true and correct copy of designated pages of the transcript of the deposition of plaintiff Loretta Young Lee that was taken on January 28, 2008.

7. Annexed hereto under Exhibit Tab F is a true and correct copy of designated pages of the transcript of the deposition of plaintiff Sidney Young that was taken on January 28, 2008.

8. Annexed hereto under Exhibit Tab G is a true and correct copy of designated pages of the transcript of the deposition of defendant Peter Uschakow that was taken on April 11, 2008.

9. Annexed hereto under Exhibit Tab H is a true and correct copy of designated pages of the transcript of the deposition of defendant Suresh Arya that was taken on April 8, 2008.

10. Annexed hereto under Exhibit Tab I is a true and correct copy of designated pages of the transcript of the deposition of defendant Jan Williamson that was taken on April 10, 2008.

11. Annexed hereto under Exhibit Tab J is a true and correct copy of designated pages of the transcript of the deposition of defendant Kathleen Ferdinand that was taken on April

7, 2008.

12. Annexed hereto under Exhibit Tab K is a true and correct copy of designated pages of the transcript of the deposition of defendant Gloria Hayes that was taken on April 18, 2008.

13. Annexed hereto under Exhibit Tab L is a true and correct copy of designated designated pages of the transcript of the deposition of defendant Dr. Jovan Milos that was taken on March 27, 2008.

Dated: New York, New York  
August 1, 2008

Respectfully submitted,  
ANDREW M. CUOMO  
Attorney General of the  
State of New York  
Attorney for Defendants  
By:

S/  
JOSE L. VELEZ  
Assistant Attorney General  
120 Broadway, 24<sup>th</sup> Floor  
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To: JONATHAN BAUER, ESQ.  
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UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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Estate of VALERIE YOUNG by VIOLA YOUNG,  
as Administratrix of the Estate of Valerie Young,  
and in her personal capacity, SIDNEY YOUNG,  
and LORETTA YOUNG LEE,

Plaintiffs,

-against-

STATE OF NEW YORK OFFICE OF MENTAL  
RETARDATION AND DEVELOPMENTAL  
DISABILITIES, PETER USCHAKOW, personally  
and in his official capacity, JAN WILLIAMSON,  
personally and in her official capacity, SURESH  
ARYA, personally and in his official capacity,  
KATHLEEN FERDINAND, personally and in her  
official capacity, GLORIA HAYES, personally and  
in her official capacity, DR. MILOS, personally and  
in his official capacity,

Defendants.

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DECLARATION

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ANDREW M. CUOMO  
Attorney General of the  
State of New York

ATTORNEY FOR  
Defendants

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